

March 9, 2023

Joint Environment Committee  
Legislative Office Building, Hearing Room 2B  
Hartford, CT 06106

SUBJECT: HB 6814 – An act concerning the establishment of a coding system for the designation of recyclable and compostable products - **OPPOSE**

Dear Chairs Lopes and Gresko, and Esteemed Members of the Committee:

On behalf of the members of the Plastics Industry Association (PLASTICS), I appreciate the opportunity to share our perspective on HB 6814 and why we are unfortunately opposed to the bill at this time. As the only association that represents the entire plastics manufacturing chain, with nearly 1 million jobs across the United States, PLASTICS has a vested interest in this issue. Sustainability is a primary focus of our members, and we work every day to design and produce more recyclable materials and create end markets so that less plastic goes to landfills. While we appreciate the underlying intent, please allow me to elaborate on our concerns regarding the bill:

PLASTICS believes recyclability marketing claims should be regulated on the federal level. Section 1(a) of this bill references the Federal Trade Commission's Green Guides as a standard by which this coding system should adhere to. **The FTC is currently revisiting their position and is holding an open comment period through April 24<sup>th</sup>, 2023, in preparation for updating of these Green Guides.** This can be attributed to the wide-spread growing interest in relation to establishing nationwide labeling laws, which PLASTICS is fully in favor of. It is impractical to imagine businesses and manufacturers would be able to abide by different labeling requirements across various jurisdictions and states. HB 6814 would not only affect manufacturers within Connecticut, but any entity selling products into the State. This would impact the free flow of goods, and ultimately result in higher consumer costs and interstate commerce issues arising. This bill also provides no clarity or guidance as to what criteria must be met for a product to be deemed recyclable or compostable. Additionally, mandating a secondary labeling requirement of a green "R", a green "C", or an interdictory circle, would only create more consumer confusion and end with more recyclable and compostable materials going to landfill.

PLASTICS understands the waste and litter problems that exist across the United States and globally, and our members and industry colleagues work every day to develop new strategies to combat this reality. However, seeking to replace plastics packaging, as Section 1(b) presents, is an improper and unfeasible approach. Plastics materials affected by this bill often have material qualities making them preferred resins for a variety of food and safety products, including PET thermoforms, polystyrene items, and polypropylene items. **Further, Life Cycle Assessments (LCAs) continually show that plastics are more environmentally sound than alternative materials and emit less greenhouse gas (GHG) overall<sup>1</sup>.** Alternatives cost more for small businesses, the environmental impacts of these alternatives like paper

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<sup>1</sup> <https://www.mckinsey.com/industries/chemicals/our-insights/climate-impact-of-plastics>

packaging or metal are more resource-intensive and emit more carbon emissions, as plastic materials are lighter and more efficient for transport resulting in less emissions from trucks and other modes of conveyance. There is also a lacking infrastructure for popular alternatives like compostables. Instead of imposing additional labeling requirements, stakeholders should work together to advance a more modern recycling system that can capture and recycle more material. Real improvements in the system can only be achieved by an emphasis on developing end markets.

PLASTICS supports this committee's goals of streamlining recycling in the State and educating consumers, however, HB 6814 is not an avenue by which these objectives can be successfully achieved. Thank you again for the opportunity to comment on this important issue. PLASTICS advocates for the responsible recycling, reuse, and recovery of all plastics products, and while we respectfully oppose this measure as it is currently written, we welcome any opportunity to work with policymakers and the committee to help ensure Connecticut's recycling stream continually improves.

If I can offer any further insight or clarification, please do not hesitate to reach out to me at [dfortunato@plasticsindustry.org](mailto:dfortunato@plasticsindustry.org).

Sincerely,

Danielle Fortunato  
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Plastics Industry Association